

**From:** Rochlin, Kevin  
**Sent:** Thursday, September 05, 2013 7:56 AM  
**To:** BARBARA.RITCHIE@fmc.com  
**Cc:** Rochlin, Kevin  
**Subject:** Approval Gamma Cap Performance Evaluation Work Plan  
**Attachments:** Approval Gamma Cap Performance Evaluation Work Plan.docx

See Attached.

Kevin Rochlin



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

September 5, 2013

Reply to  
Attn. of ECL-111

Ms. Barbara Ritchie  
FMC Corporation  
1735 Market Street  
Philadelphia, Pennsylvania 19103

**RE: Unilateral Administrative Order for Remedial Design and Remedial Action  
EPA Docket No. CERCLA 10-2013-0116  
FMC Responses to EPA IDEQ and SBT Comments on the Gamma Cap Performance  
Evaluation Work Plan submitted July 15, 2013**

Dear Ms. Ritchie:

EPA has reviewed the referenced work plan and responses provided to comments from EPA, IDEQ and the SBT. FMC's responses are acceptable. The Gamma Cap Performance Evaluation Work Plan is approved as submitted pursuant to Section XVII of the referenced order.

EPA wants to make sure that FMC is aware of the following EPA positions so that they may be addressed as they arise:

1. While EPA expects that the performance evaluation will be successful using the proposed soil depth, if in fact it is not, FMC will be required to make a field change during the test to add an additional lift of material. The placement of material will need to follow the plan currently submitted. FMC is required to immediately notify EPA, IDEQ and SBT if the change is required, and EPA approval of the change will be required.
2. As EPA has stated previously, FMC will be required to perform post construction performance standards verification of the remedial action. This includes performance verification of the shielding of the gamma caps/ET caps. Direct verification measurements of gamma radiation will be required unless it is demonstrated to EPA satisfaction that it is not possible.

EPA has committed that it will conduct field oversight of all of FMC activities. I am aware that FMC intends to begin mobilizing upon approval of this document. Please provide a letter noting your current schedule so that EPA can plan accordingly.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, reading "Kevin Rochlin". The signature is written in a cursive, flowing style. It is positioned to the left of a thin vertical line.

Kevin Rochlin,  
Project Manager